## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

JESSIE SERRANO, on her own behalf and on behalf of JOZEF MANGUAL SERRANO, a minor, individually and on behalf of all others similarly situated,

Plaintiffs.

v.

INMEDIATA CORP., a Delaware corporation, INMEDIATA HEALTH GROUP CORP., a Puerto Rico corporation, and DOES 1 to 10, inclusive,

Defendants.

Case No. 3:19-cv-01811-JAG

Honorable Judge Jay A. Garcia-Gregory

DECLARATION OF JESSIE SERRANO IN SUPPORT OF THE PARTIES' JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Complaint Filed: August 28, 2019

- I, Jessie Serrano, declare as follows:
- 1. I am over the age of eighteen, have personal knowledge of the following, and if called as a witness, could and would testify competently thereto.
- 2. I am the proposed class representative in this case, and I understand what this case is about, and have participated actively in it. As the proposed class representative in this matter, I understand my duties towards the absent Class Members, including that I have a fiduciary duty towards them and accordingly must look out for their best interests. I understand that I also have a responsibility to actively participate in the case. I have done so. Would the case have gone to trial, I was prepared to participate in the trial, including testifying. I was never offered anything to become the class representative. I became the proposed class representative in this matter because I wanted to help other patients whose personal health and other identifying information (including full names, addresses, birthdates, medical claims information, and Social Security numbers) was exposed online to unauthorized third parties by Defendants.
  - 3. I have been in active communication with my attorneys in this matter.

Prior to my attorneys filing this lawsuit, they gave me an opportunity to review and verify the contents of the Complaint, which I did. Also before this lawsuit was filed, I gathered documents to provide to my attorneys, which they then analyzed for me and we reviewed together. Since then, I have exchanged numerous communications with my attorneys and provided them with any supplementary information they have requested.

4. I have discussed the settlement in this case with my attorneys, and I am in favor of it and consider it to be a favorable one for the Class Members.

I declare under penalty of perjury under the laws of the Puerto Rico and the United States that the foregoing is true and correct.

Executed this 17<sup>th</sup> day of February, 2021, at \_\_\_\_\_

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Tessie Serrano